IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO EASTERN DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 1:10CR392	12/6/12
Plaintiff,)	HIDGE DONALD O MIGE	motion Sited
V.)	JUDGE DONALD C. NUGE	Woods a 4
ROMEO VASILE CHITA,)	UNITED STATES' MOTION SUPERSEDING INDICTME	. \/
aka Rich)	LIMITED PURPOSE OF AF	REST AND
)	EXTRADITION OF DEFEN	DANT
)		
Defendant.)	FILED UNDER SEAL	

Now comes the United States of America, by and through counsel, Steven M. Dettelbach, United States Attorney, and John D. Sammon, Assistant United States Attorney, and respectfully moves this Court for an order directing that the Superseding Indictment returned in the above-captioned case be unsealed for the limited purpose of arresting and extraditing the defendant, Romeo Vasile Chita, who is believed to be in Italy.

On September 16, 2010, a grand jury in the Northern District of Ohio returned an indictment against Chita and eight codefendants. A superseding indictment was filed on October 20, 2011. Both indictments were filed under seal and remain sealed at this time, pending the arrests of the defendants who have been on trial in Romania for several years. Recent

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intelligence information received from a confidential source indicates that Romeo Vasile Chita, the lead defendant in this case, may currently be in Northern Italy.

It is necessary that the Superseding Indictment be unsealed and provided to the Department of Justice, Office of International Affairs; foreign authorities; and others as necessary to secure the arrest and extradition of Defendant Chita.

WHEREFORE, for the foregoing reasons, the United States respectfully moves this Court for an order to unseal the Superseding Indictment in the above-captioned proceeding for the limited purpose of arresting and extraditing the defendant, Romeo Vasile Chita.

Respectfully submitted,

STEVEN M. DETTELBACH United States Attorney

By:

John D. Sammon

Assistant U.S. Attorney

Reg. No. 0033601

400 United States Courthouse

801 West Superior Avenue

Cleveland, Ohio 44113

Telephone No: (216) 622-3829 Facsimile No: (216) 522-7358 E-Mail: john.sammon@usdoj.gov